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bitrators' Decision, 32 AM. L. REG. 909. Game that migrates from state to state is thus constantly passing from the sovereignty of one state into that of another. Such a situation could be most effectively regulated by the federal government, but it seems clear that the statute in the principal case is beyond its powers. The federal government does not have sovereignty over the game, neither is there any legal principle authorizing the nation to assume powers because it can exercise them better than the states. Moreover, though the federal power over interstate commerce covers more than mere sales, and might conceivably come to include journeyings of citizens from state to state, the step from that to the uncontrolled movements of wild game is a very long one. It would seem that the worthy purpose of this statute must be carried out in some other way, either by exercise of the taxing power or by constitutional amendment.

POLICE POWER — REGULATION OF TRADES, PROFESSIONS AND BUSINESS — REGULATION OF RATES: FIRE INSURANCE. — A Kansas statute (Session Laws of 1909, c. 152, § 3) authorized the superintendent of insurance to establish reasonable rates for fire insurance companies. *Held*, that it is constitutional. *German Alliance Ins. Co.* v. *Lewis*, 34 Sup. Ct. 612.

For a discussion of the principles involved, see NOTES, p. 84.

PUBLIC SERVICE COMPANIES — REGULATION OF PUBLIC SERVICE COMPANIES — TELEPHONE COMPANIES: COMMISSION'S ORDER COMPELLING PHYSICAL CONNECTIONS. — The plaintiff company, operating long distance telephone lines in various states and maintaining a limited telephone service in a hotel, was ordered by the Oregon railroad commission to make physical connection with a local telephone company which had telephones in each room of the hotel so that both systems might be used interchangeably by the hotel. *Held*, that the order is valid. *Pacific Tel. & Tel. Co.* v. *Wright-Dickinson Hotel Co.*, 214 Fed. 666 (Dist. Ct., Ore.).

This case supports the correct view, that the order is to be sustained as a reasonable regulation of undertakings affected with a public interest, and not held void as an attempted exercise of the power of eminent domain without proper compensation. For a criticism of a contrary case, see 27 HARV. L. REV. 687.

RAILROADS — REGULATION OF RATES — POWER OF INTERSTATE COMMERCE COMMISSION OVER INTRASTATE RATES — "SHREVEPORT RATE CASES." — Railroads running between Shreveport, La., and Houston and Dallas, Tex., maintained higher rates between Shreveport and Texas points than for corresponding distances within Texas. The Interstate Commerce Commission found that this constituted unjust discrimination in favor of intrastate traffic. It then fixed maximum interstate rates, and ordered the carriers to equalize their intrastate and interstate rates. The Railroad Commission of Texas had established intrastate rates lower than the new maximum rates, and the Commerce Court held, on appeal, that the carriers could disregard this intrastate schedule, and increase those rates to correspond with the order. The carriers then attacked the validity of the order in the Supreme Court. *Held*, that the order be sustained. *Houston, E. & W. T. Ry. Co.* v. *United States*, 234 U. S. 342.

The court upholds the order as within the power of the Interstate Commerce Commission to regulate the relation between interstate and intrastate rates so as to prevent unjust discrimination against interstate commerce. For a discussion of the questions involved, see an article on page 34 of this issue of the REVIEW. Similar questions were discussed in the comment and leading article on the Minnesota Rate Cases. See 24 HARV. L. REV. 679; 27 *id.* 14.